

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

**RENE CASTILLO, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 5:20-cv-1269-FB-ESC

ISEC INCORPORATED

DEFENDANT

**JOINT MOTION FOR EXTENSION OF DEADLINE TO
FILE MOTION FOR SETTLEMENT APPROVAL**

Plaintiff Rene Castillo, individually and on behalf of all others similarly situated, and Defendant ISEC, by and through their undersigned counsel, for their Joint Status Report, the Parties state as follows:

1. On March 30, 2023, the Parties filed a Joint Advisory and Notice of Settlement informing the Court that they were in the process of finalizing a settlement agreement. ECF No. 41.
2. The Parties have drafted a settlement agreement document and are in the process of editing it to the satisfaction of all Parties.
3. Defendant's counsel was out of the country in late March and early April, which delayed the initial drafting of the agreement.
4. Accordingly, the Parties anticipate request that the deadline to file their motion for settlement approval be extended by twenty-two days, to May 22, 2023.
5. This extension is sought in good faith and not for the purpose of delay.

WHEREFORE, premises considered, Plaintiff and Defendant pray this Court grant this Motion to extend the deadline to file their motion for settlement approval to May 22, 2023.

Respectfully submitted,

**RENE CASTILLO, Individually
And on Behalf of All Others
Similarly Situated, PLAINTIFF**

SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Tex. Bar No. 24077858
josh@sanfordlawfirm.com

and **ISEC INCORPORATED
DEFENDANT**

LEWIS, BRISBOIS, BISGAARD
& SMITH, LLP
2100 Ross Avenue, Suite 2000
Dallas, TX 75201
Telephone: (214) 722-7124
Facsimile: (214) 722-7111

/s/ John M. Lynch
John M. Lynch
Tex. Bar No. 24063968
John.lynch@lewisbrisbois.com

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2023, a true and correct copy of the foregoing MOTION FOR EXTENSION was filed with the Clerk of Court via the CM/ECF system which served a copy to the following:

John M. Lynch
Lewis, Brisbois, Bisgaard & Smith, LLP
2100 Ross Avenue, Suite 2000
Dallas, TX 75201
John.lynch@lewisbrisbois.com

/s/ Josh Sanford

Josh Sanford